USDA

Privacy Impact Assessment (PIA)

Acreage Reporting and Compliance Systems (ARCS)

Revision: *1.06*

FSA
FARM SERVICE AGENCY

Farm Service Agency

Date: *July 24, 2009*

Document Information

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Document Revision and History			
Revision	Date	Author	Comments
1.01	7/6/2009	D. Brizendine ISO	Initial document
1.02	July 7, 2009	D. Brizendine ISO	Populated Sections 3,4,5
1.03	July 8, 2009	J. Finke – ECS	Review and Minor updates
1.04	July 20, 2009	D.Brizendine ISO	Updated System Owner Information
1.05	July 23, 2009	Paula Hahn	Point of contact update
1.06	July 24, 2009	D.Brizendine	Updated responses for 24,25,26,26.1; Document review

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1 Purpose of Document

USDA DM 3515-002 states: "Agencies are responsible for initiating the PIA in the early stages of the development of a system and to ensure that the PIA is completed as part of the required System Life Cycle (SLC) reviews. Systems include data from applications housed on mainframes, personal computers, and applications developed for the Web and agency databases. Privacy must be considered when requirements are being analyzed and decisions are being made about data usage and system design. This applies to all of the development methodologies and system life cycles used in USDA.

Both the system owners and system developers must work together to complete the PIA. System owners must address what data are used, how the data are used, and who will use the data. System owners also need to address the privacy implications that result from the use of new technologies (e.g., caller identification). The system developers must address whether the implementation of the owner's requirements presents any threats to privacy."

The Privacy Impact Assessment (PIA) document contains information on how the Acreage Reporting and Compliance Systems affects the privacy of its users and the information stored within. This assessment is in accordance with NIST SP 800-37 *Guide for the Security Certification and Accreditation of Federal Information Systems.*

2 System Information

System Information	
Agency:	Farm Service Agency
System Name:	Acreage Reporting and Compliance Systems
System Type:	☒ Major Application ☐ General Support System ☐ Non-major Application
System Categorization (per FIPS 199):	☐ High ☒ Moderate ☐ Low
Description of System:	The Acreage Reporting and Compliance Systems (ARCS) facilitates in checking the accuracy of producer reported acreage and that producers are complying with conditions of other farm programs (typically soil and water conservation measures). Summarized data are provided to other automated applications to update farm crop records and for use by the Conservation Reserve Program and the Noninsured Crop Disaster Assistance Program. ARCS records, processes, and maintains producer crop acreage reports, producer shares, selection of farm crops for inspection, determined acreage, determination of program and acreage compliance, related compliance reports and various County, State, and national management reports.
Who owns this system? (Name, agency, contact information)	Sandy Bryant (202) 720-4380 Sandy.Bryant@wdc.usda.gov Rebecka Gaskill (816) 926-1645 rebecka.gaskill@kcc.usda.gov Jennifer Thomas (816) 926-1454 Jennifer.Thomas@kcc.usda.gov

Who is the security contact for this system? (Name, agency, contact information)	Brian Davies Information System Security Program Manager (ISSPM) U.S. Department of Agriculture Farm Service Agency 1400 Independence Avenue SW Washington, D.C. 20250 (202) 720-2419 brian.davies@wdc.usda.gov
Who completed this document? (Name, agency, contact information)	Paula Hahn (816) 926-2103 paula.hahn@kcc.usda.gov

Date: July 24, 2009

3 Data Information

3.1 Data Collection

No.	Question	Response
1	Generally describe the data to be used in the system.	**Acreage Reporting and Compliance Systems** Customer: Producer data is used in association with farm and crop information being reported and acted upon throughout the compliance systems. Specifically, a producer's ID, ID type, and entity type, as well as any associated farm numbers are used as key information. Although a producer's name and address information may be used, that information is not stored by these systems, with the exception of the Highly Erodible Land/Wetlands Conservation (HELC) system which does store producer names. Employee: N/A Other: N/A
2	Does the system collect Social Security Numbers (SSNs) or Taxpayer Identification Numbers (TINs)?	☒ Yes ☐ No – If NO, go to question 3.
2.1	State the law or regulation that requires the collection of this information.	7 CFR Part 718
3	Is the use of the data both relevant and necessary to the purpose for which the system is being designed? In other words, the data is absolutely needed and has significant and demonstrable bearing on the system's purpose as required by statute or by Executive order of the President.	☒ Yes ☐ No

No.	Question	Response
4	Sources of the data in the system.	Name and address, farm and tract, farm producer, GIS, and crop files are all sources of information, as well as information provided by aerial photography, farm inspections, and the producers themselves. Other than internal FSA data, the APFO (Aerial Photography Field Office) provides aerial maps of land to be used in acreage reporting and compliance activities.
4.1	What data is being collected from the customer?	A producer's/customer's tax ID, ID type, and entity type, as well as any associated farm numbers are used as key information in these systems. The customer provides either their name or tax ID to initiate a transaction, and from there may go on to provide crop and/or commodity information, as well as associated acreages, by farm, tract, and field. Customer provided crop data includes crop, crop type, irrigation practice, intended use, etc.
4.2	What USDA agencies are providing data for use in the system?	The Customer Name and Address files and SCIMS are each used to retrieve customer information. The Farm and Tract file and the Farm Producer file are used to retrieve farm information. The Crop Validation System (CVS) and the Crop Acreage Data Warehouse are each used to retrieve crop information. And, the Compliance Web Service (CWS) is used to retrieve acreage reporting and compliance data. FSA owns all of these data sources.
4.3	What state and local agencies are providing data for use in the system?	None
4.4	From what other third party sources is data being collected?	Producer/Customer
5	Will data be collected from sources outside your agency? For example, customers, USDA sources (i.e., NFC, RD, etc.) or Non-USDA sources.	☒ Yes ☐ No – If NO, go to question 6.
5.1	How will the data collected from customers be verified for accuracy, relevance, timeliness, and completeness?	There is series of status reports that the service center runs to verify accuracy and completeness.

No.	Question	Response
5.2	How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?	Farm and County totals have been added to the nightly uploads to verify completeness.
5.3	How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?	N/A

3.2 Data Use

No.	Question	Response
6	Individuals must be informed in writing of the principal purpose of the information being collected from them. What is the principal purpose of the data being collected?	NASS uses summarized crop and acreage data for statistical surveys and projections. RMA uses detailed land, producer, and crop data for both populating their systems and data integrity validations.
7	Will the data be used for any other purpose?	☐ Yes ☒ No – If NO, go to question 8.
7.1	What are the other purposes?	
8	Is the use of the data both relevant and necessary to the purpose for which the system is being designed? In other words, the data is absolutely needed and has significant and demonstrable bearing on the system's purpose as required by statute or by Executive order of the President	☒ Yes ☐ No
9	Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected (i.e., aggregating farm loans by zip codes in which only one farm exists.)?	☒ Yes ☐ No – If NO, go to question 10. This system creates farm/producer profiles with commodity information that could be used to affect market trends.
9.1	Will the new data be placed in the individual's record (customer or employee)?	☒ Yes ☐ No

No.	Question	Response
9.2	Can the system make determinations about customers or employees that would not be possible without the new data?	☒ Yes ☐ No Information reported by the producer/customer is subject to a spot check process and findings of non-compliance may result in customers being restricted from program participation and/or payment reductions.
9.3	How will the new data be verified for relevance and accuracy?	Only employees input data, and the data is validated per system requirements and other documents such as 2CP, the Acreage Compliance Determinations Manual.
10	Individuals must be informed in writing of the routine uses of the information being collected from them. What are the intended routine uses of the data being collected?	Data is used to verify compliance and for analysis.
11	Will the data be used for any other uses (routine or otherwise)?	☐ Yes ☒ No – If NO, go to question 12.
11.1	What are the other uses?	
12	Automation of systems can lead to the consolidation of data – bringing data from multiple sources into one central location/system – and consolidation of administrative controls. When administrative controls are consolidated, they should be evaluated so that all necessary privacy controls remain in place to the degree necessary to continue to control access to and use of the data. Is data being consolidated?	☒ Yes ☐ No – If NO, go to question 13. Guidance for data consolidation is provided in 2CP, the Acreage Compliance Determinations Manual. Unauthorized access is prevented via mainframe controls. Access to Crop Acreage Data Warehouse (CADW) information is restricted to authorized employees and NASS users who have been approved thru PECD. The Compliance Web Service (CWS) information is only available to authorized web applications.

No.	Question	Response
12.1	What controls are in place to protect the data and prevent unauthorized access?	Guidance for data consolidation is provided in 2CP, the Acreage Compliance Determinations Manual. Unauthorized access is prevented via mainframe controls. Access to Crop Acreage Data Warehouse (CADW) information is restricted to authorized employees and NASS users who have been approved thru PECD. The Compliance Web Service (CWS) information is only available to authorized web applications.
13	Are processes being consolidated?	☒ Yes ☐ No – If NO, go to question 14.
13.1	What controls are in place to protect the data and prevent unauthorized access?	Guidance for data consolidation is provided in 2CP, the Acreage Compliance Determinations Manual. Unauthorized access is prevented via mainframe controls. Access to Crop Acreage Data Warehouse (CADW) information is restricted to authorized employees and NASS users who have been approved thru PECD. The Compliance Web Service (CWS) information is only available to authorized web applications.

3.3 Data Retention

No.	Question	Response
14	Is the data periodically purged from the system?	☐ Yes ☒ No – If NO, go to question 15. Data is retained indefinitely. However, if data needs to be purged, possibly due to space limitations on the System/36, PECD makes that determination. PECD determines when and if data can or should be eliminated from our systems/databases. System/36 county data is consolidated thru CAD-NASS uploads and stored on the mainframe prior to purging data files from the county systems.

No.	Question	Response
14.1	How long is the data retained whether it is on paper, electronic, in the system or in a backup?	
14.2	What are the procedures for purging the data at the end of the retention period?	
14.3	Where are these procedures documented?	
15	While the data is retained in the system, what are the requirements for determining if the data is still sufficiently accurate, relevant, timely, and complete to ensure fairness in making determinations?	Historic data may be updated as necessary to maintain data accuracy. Data integrity is maintained thru printed status reports which may indicate areas of concern that need to be reviewed by employees and reconciled as necessary per 2CP, the Acreage Compliance Determinations Manual, and/or other governing policies. In addition, OIG performs random audits to ensure data integrity.
16	Is the data retained in the system the minimum necessary for the proper performance of a documented agency function?	☒ Yes ☐ No

3.4 Data Sharing

No.	Question	Response
17	Will other agencies share data or have access to data in this system (i.e., international, federal, state, local, other, etc.)?	☒ Yes ☐ No – If NO, go to question 18. Yes, NASS uses the Compliance Web Service (CWS) and the Crop Acreage Data Warehouse (CADW) to view selected data. Risk Management Agency (RMA) and the Bureau of Reclamation (BOR) use the Compliance Web Service as well. Of course, all of this data is shared on a restrictive basis thru the Freedom Of Information Act (FOIA).
17.1	How will the data be used by the other agency?	NASS uses summarized crop and acreage data for statistical surveys and projections. RMA uses detailed land, producer, and crop data for both populating their systems and data integrity validations.

No.	Question	Response
17.2	Who is responsible for assuring the other agency properly uses the data?	Refer to the 4RM Handbook, which is the FSA/RMA Handbook that provides procedure and guidance for improving FCIC program compliance and integrity as required by the Agricultural Risk Protection Act of 2000.
18	Is the data transmitted to another agency or an independent site?	☒ Yes ☐ No – If NO, go to question 19.
18.1	Is there appropriate agreement in place to document the interconnection and ensure the PII and/or Privacy Act data is appropriately protected?	Yes
19	Is the system operated in more than one site?	☒ Yes ☐ No – If NO, go to question 20. National and state training seminars, as well as 2CP, the Acreage Compliance Determinations Manual, are used to educate employees on system use and data integrity.
19.1	How will consistent use of the system and data be maintained in all sites?	National and state training seminars, as well as 2CP, the Acreage Compliance Determinations Manual, are used to educate employees on system use and data integrity.

3.5 Data Access

No.	Question	Response
20	Who will have access to the data in the system (i.e., users, managers, system administrators, developers, etc.)?	County, State, and National USDA office employees can access the data; however, only the county employees are able to modify the data. Also, a limited number of specific NASS employees can view the data.

No.	Question	Response
21	How will user access to the data be determined?	As of now, most of these systems restrict access based on System/36 sign-on privileges granted to state and county office employees. A county employee will only be able to access and modify data for their associated county(s). Similarly, a state employee may be able to view some of the data from these systems for their specific state, but not nationwide. eAuth serves to restrict access to the web-based systems, although each user must first be granted access by the associated program sponsor. The Crop Acreage Data Warehouse requires an FSA-13-A, Data Security Access Authorization Form, to be submitted and approved thru PECD/WCD before access will be granted. Only state office and NASS employees have been granted this access in the past. A mainframe ID and database ID may also be required to access the CADW if the user wants to access the system from their desktop. Refer to 6IRM, the Information Systems Security Program Manual, for further guidance.

No.	Question	Response
21.1	Are criteria, procedures, controls, and responsibilities regarding user access documented?	☒ Yes ☐ No As of now, most of these systems restrict access based on System/36 sign-on privileges granted to state and county office employees. A county employee will only be able to access and modify data for their associated county(s). Similarly, a state employee may be able to view some of the data from these systems for their specific state, but not nationwide. eAuth serves to restrict access to the web-based systems, although each user must first be granted access by the associated program sponsor. The Crop Acreage Data Warehouse requires an FSA-13-A, Data Security Access Authorization Form, to be submitted and approved thru PECD/WCD before access will be granted. Only state office and NASS employees have been granted this access in the past. A mainframe ID and database ID may also be required to access the CADW if the user wants to access the system from their desktop. Refer to 6IRM, the Information Systems Security Program Manual, for further guidance.

No.	Question	Response
22	How will user access to the data be restricted?	System/36 users have access to all data, but only within their region of responsibility. Web-based users, including individual state office and NASS users have access to view Crop Acreage Data Warehouse reports nation-wide. Highly Erodible Land/Wetland Conservation Violation (HELC) information is viewable by anyone with internet access, with the exception of customer names and tax IDs. State users can view name and tax ID information, as well as add and edit data within their state. National users can view name and tax ID information for the whole nation. Admin users can view name and tax ID information, as well as add, edit, and delete data nation-wide.
22.1	Are procedures in place to detect or deter browsing or unauthorized user access?	☒ Yes ☐ No
23	Does the system employ security controls to make information unusable to unauthorized individuals (i.e., encryption, strong authentication procedures, etc.)?	☒ Yes ☐ No Policies in 2CP, the Acreage Compliance Determinations Manual, along with Annual Security Awareness Training are used to curb authorized users from misusing the system data.

3.6 Customer Protection

No.	Question	Response
24	Who will be responsible for protecting the privacy rights of the customers and employees affected by the interface (i.e., office, person, departmental position, etc.)?	USDA Privacy Office
25	How can customers and employees contact the office or person responsible for protecting their privacy rights?	By contacting John Underwood, Privacy Officer, at john.underwood@kcc.usda.gov & 816.926.6992

No.	Question	Response
26	A "breach" refers to a situation where data and/or information assets are unduly exposed. Is a breach notification policy in place for this system?	☒ Yes – If YES, go to question 27. Common FSA incident reporting process. ☐ No
26.1	If NO, please enter the Plan of Action and Milestones (POA&M) number with the estimated completion date.	
27	Consider the following: Consolidation and linkage of files and systems Derivation of data Accelerated information processing and decision making Use of new technologies Is there a potential to deprive a customer of due process rights (fundamental rules of fairness)?	☐ Yes ☒ No – If NO, go to question 28.
27.1	Explain how this will be mitigated?	
28	How will the system and its use ensure equitable treatment of customers?	The system contains no identifying information on race, religion, gender, national origin, or age.
29	Is there any possibility of treating customers or employees differently based upon their individual or group characteristics?	☐ Yes ☒ No – If NO, go to question 30
29.1	Explain	

4 System of Record

No.	Question	Response
30	Can the data be retrieved by a personal identifier? In other words, does the system actually retrieve data by the name of an individual or by some other unique number, symbol, or identifying attribute of the individual?	☒ Yes ☐ No – If NO, go to question 31
30.1	How will the data be retrieved? In other words, what is the identifying attribute (i.e., employee number, social security number, etc.)?	Data can be retrieved by producer/customer name, tax ID, and/or farm serial number.
30.2	Under which Systems of Record (SOR) notice does the system operate? Provide number, name and publication date. (SORs can be viewed at www.access.GPO.gov.)	USDA/FSA-2 – Farm Records File
30.3	If the system is being modified, will the SOR require amendment or revision?	☐ Yes ☒ No

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5 Technology

No.	Question	Response
31	Is the system using technologies in ways not previously employed by the agency (e.g., Caller-ID)?	☐ Yes ☒ No – If NO, the questionnaire is complete.
31.1	How does the use of this technology affect customer privacy?	

Date: July 24, 2009

6 Completion Instructions

Upon completion of this Privacy Impact Assessment for this system, the answer to OMB A-11, Planning, Budgeting, Acquisition and Management of Capital Assets, Part 7, Section E, Question 8c is:

1. Yes.

PLEASE SUBMIT A COPY TO THE OFFICE OF THE ASSOCIATE CHIEF INFORMATION OFFICE FOR CYBER SECURITY.